



Please reply to Melville, NY Office:

200 Broadhollow Road, Suite 207

Melville, NY 11747

Phone (631) 390-8365

Facsimile (305) 416-3190

New York
New Jersey
Miami
Fort Lauderdale
Bonita Springs
Boca Raton
West Palm Beach
Orlando
Tampa
Jacksonville

October 16, 2020

VIA ECF ONLY

United States Magistrate Judge Robert W. Lehrburger

United States District Court

Southern District of New York

Daniel Patrick Moynihan US Courthouse

500 Pearl Street

New York, NY 10007-1312

Re: Stason Sutton v. 765 9th Avenue Corporation and Covadonga Inc.

Civil Action No.: 1:19-cv-4736

File No.: 50237

Dear Judge Lehrburger:

This law firm represents Defendants 765 9th Avenue Corporation and Covadonga Inc. in the above captioned ADA accessibility matter. As the Court is aware, this matter was stayed so as to allow Defendants the opportunity to make ADA compliant remediations to the subject premises. We write to update the Court concerning the status of the installation of a permanent ramp at the subject premises. As indicated, Defendant Covadonga Inc. accepted a contractor's bid to perform the aforementioned installation. As indicated, as a result of the COVID-19 pandemic, Governor Cuomo banned all nonessential construction, which delayed the aforementioned ramp installation. The aforementioned ban of all nonessential construction has since been lifted. The Contractor recently indicated that the installation of the subject handicap ramp has been completed.

Based on the aforementioned reasoning, this law firm will contact Plaintiff's counsel to coordinate an inspection of the premises so as to evaluate any potential remaining ADA violations. Assuming all ADA violations have been remediated, Defendants are hopeful that the parties can work together in furtherance of resolving this matter. Based on the aforementioned reasoning, in an effort to minimize legal fees in this matter, we request that the current stay remain in place. We will continue to update the Court related to the status of the aforementioned inspection and any potential settlement negotiations. We are available to discuss this matter in further detail at the request of the Court.

We thank the Court for its attention in this matter.

Respectfully Submitted,

Robert C. Graves-Grimal

Robert C. Graves-Grimal, Esq.

cc: Via CM/ECF
PARKER HANSKI LLC
Attorneys for Plaintiff